

INSPECTION ADMINISTRATIVE PROCEDURE

A-112

CONSTRUCTION ON-LOCATION INSPECTION PROGRAM

October 19, 2001

Revision 0

Approved: _____ Date: _____
Verification and Confirmation Official

Concur: _____ Date: _____

Table of Contents

1.0	PURPOSE	1
2.0	POLICY	1
3.0	GENERAL GUIDANCE	1
4.0	SPECIFIC GUIDANCE.....	2
4.1	Inspection.....	2
4.2	Coordination with Office-based Inspectors	2
4.3	Communications with the Verification and Confirmation Official	3
4.4	Communication with Contractor Management.....	3
4.5	Communication with Onsite Workers	3
4.6	Site Access.....	3
4.7	Media Relations	3
4.8	Work Schedule.....	4
4.9	Inspector Qualification.....	4
5.0	ADMINISTRATIVE ISSUES	4
5.1	Office Security	4
5.2	Dosimetry and Protective Equipment	4
6.0	REFERENCES	4
7.0	LIST OF ACRONYMS	5

INSPECTION ADMINISTRATIVE PROCEDURE A-112, DRAFT CONSTRUCTION ON-LOCATION INSPECTION PROGRAM

1.0 PURPOSE

This procedure describes the Office of Safety Regulation (OSR) program for using on-location (OL) inspectors during construction of the River Protection Project Waste Treatment Plant (RPP-WTP) facility. This procedure includes a description of OL inspector duties and guidance as to how these duties are carried out.

2.0 POLICY

The OSR will assign one or more inspectors who will conduct inspections from an office located at the Contractor's site. This program is consistent with the provisions of Contract No. DE-AC27-01RV14136, Section C.7(a)(14), which requires the Contractor to provide office space for exclusive use of full time U.S. Department of Energy personnel, and with the Inspection Program Description which addresses the use of on-location inspectors. Initially, starting about 6 months after the initiation of construction activities, individual OSR staff members will be assigned as OL inspectors. At some subsequent time, one or more OSR staff may be permanently assigned as OL inspectors.

The OL inspector will report to the Verification and Confirmation Official (VCO). Inspection planning and report writing, and enforcement activities related to OL inspection Findings will be handled consistent with OSR policies for all inspection personnel.

The OL inspector will keep apprised of the real or potential safety issues in areas of OSR responsibility. Significant issues will be reported to the VCO.

3.0 GENERAL GUIDANCE

The major functions of the OL inspector(s) are to provide:

- Direct inspection of Contractor construction activities. OL inspection will focus on work in progress, special activities, developing problem areas, corrective actions, and other similar matters of short-term duration. Office-based OSR inspectors will normally conduct inspections involving detailed technical verification, extensive record review, or in-depth investigations.
- An awareness of real or potential safety problem areas. Such awareness will derive from observations during routine rounds of the construction site, the conduct of inspections, and attendance at Contractor meetings.

- Initial evaluation of occurrences or events. The OL inspector will make a general inquiry into potentially reportable occurrences, and will advise the VCO of the results. The VCO will determine if the OL inspector should conduct a more detailed inspection into the situation.
- Prompt reporting to the VCO of any situation that has potential for imminent and/or significant damage for human health and safety or the environment, or that may be of interest to the general public. If the situation is a reportable event which involves activation of the Hanford Emergency Response Plan, the OL inspector may be assigned as an emergency responder at the Incident Command Post. Such assignment by the VCO would be made in accordance with the provisions of MD 5.4, "Event Response, Follow-up, and Report Evaluation."
- Routine liaison with site Contractor management regarding OSR inspection activities. This includes being aware of the schedule of office-based site inspections, and knowledgeable of the significant results and/or Findings of past inspections.
- Accessibility to Contractor site employees who may have questions about safety issues at the facility or about the OSR oversight process.

4.0 SPECIFIC GUIDANCE

4.1 Inspection

- 4.1.1 OL inspections will cover the period of inspector assignment on-site, but will not exceed a one-month period. An inspection plan will be developed with the VCO prior to the inspection. Normally, OL inspections will focus on on-going construction activity and short-term activities, such as close-out of open items. Additionally, in-depth inspections also may be completed by office based inspectors.
- 4.1.2 Entrance and exit interviews will be conducted according to Inspection Administrative Procedure A-103, "Entrance and Exit Meetings."
- 4.1.3 Inspection reports will be written following the guidance in Inspection Administrative Procedure A-107, "Inspection Documentation," and inspection results and Findings will be conveyed to the Contractor according to the guidance in Management Directive 5.3, "Corrective Action Program."

4.2 Coordination with Office-based Inspectors

The OL inspector should communicate with any office-based site inspectors prior to the start of their inspection. This communication will ensure that there is not unnecessary overlap in any inspection area. The OL inspector should provide information on any newly identified area of concern in the planned area of inspection. The OL inspector also should attend the exit meeting for any office-based site inspection.

4.3 Communications with the Verification and Confirmation Official

OL inspector should be sensitive to and promptly inform the VCO of potential or actual safety items or other matters of potential public interest that may arise. The VCO should also be notified of any issue that may substantially impact the inspection plan. At the conclusion of the inspection period, but prior to the exit meeting, the VCO should be advised of the issues to be discussed with Contractor management at the exit meeting.

4.4 Communication with Contractor Management

In addition to entrance and exit interviews, OL inspector may find it beneficial to attend certain Contractor meetings. General planning or schedule meetings may be helpful in focussing the inspector on the more significant construction activities. Arrangements for OL inspector to attend any Contractor meeting must be made with management before the meeting. Any documents received from the Contractor at such meetings must be evaluated for public disclosure, as provided in Management Directive, 2.1, "Information Management."

Consistent with the OSR's Corrective Action Plan, the OL inspector should notify Contractor management promptly of any observation of any matter which appears to present an imminent safety hazard.

4.5 Communication with Onsite Workers

The on-going presence of OL inspector at the work site may provide increased opportunity for Contractor employees to express work-related concerns. Consistent with MD 1.8, "Employee Concern Resolution," and related Handbook 1.8, workers should be encouraged to take concerns to their management (unless the concerns relate to management wrong doing), the Contractor's Employee Concerns Program (ECP), or the Richland Operations Office of Special Concerns (RL-OSC). However, if they insist in bringing their concerns to the OL inspector, the guidance in MD 1.8 should be followed.

4.6 Site Access

The OL inspector will complete the required Contractor training and obtain the highest level of unescorted site access which Contractor employees receive. They will follow Contractor rules and safety precautions. Consistent with safety, unaccompanied access will normally be used to inspect areas in which any Contractor employee has unescorted access.

4.7 Media Relations

In the event of direct contact from the media to the OL inspector, the inspector may provide factual information related to any ongoing regulatory activities (e.g., an inspection is in progress) relative to the subject of the inquiry. However, the inspector should not provide any predecisional conclusions or inspection information that has not yet been made public.

Questions regarding the Contractor's activities should be referred to the Contractor. The VCO and the ORP Office of Communication should be notified promptly of any direct media contacts.

4.8 Work Schedule

OL inspector should follow a work schedule developed with the VCO. Periodic backshift and weekend inspections may be desirable. Backshift coverage is considered to be any time outside of the Contractor's normal day shift. To maximize the benefit of the backshift coverage, inspector should try to prevent the development of a pattern. For construction activities, backshift coverage will normally focus on observations of significant important-to-safety construction activities.

4.9 Inspector Qualification

The VCO is responsible for ensuring the qualification of personnel as OL inspectors. OL inspectors must meet the training requirements described in Inspection Administrative Procedure A-109, "Inspector Qualification Program."

5.0 ADMINISTRATIVE ISSUES

5.1 Office Security

The OL inspector need not be present in the designated OSR office space at the Contractor's facility when activities like janitorial services are performed. However, documents which should not be seen except by OSR personnel (e.g., inspection plans, draft documents, etc.) are to be kept in locked containers when an OL inspector is not physically present.

5.2 Dosimetry and Protective Equipment

The OSR office will provide personal dosimeters and protective equipment to the OL inspectors, as required. The Contractor may also provide dosimeters for the OL inspectors. (For example, if significant contamination is discovered or if industrial radiography is being performed.) The results of the OSR provided dosimeters would be used for official exposure records.

6.0 REFERENCES

RL/REG-98-25, *Inspection Administrative Procedures*, U.S. Department of Energy, Office of River Protection.

A-103, "Entrance and Exit Meetings"

A-107, "Inspection Documentation"

A-109, "Inspector Qualification Program"

RL/REG-97-05, *Office of Safety Regulation Management Directives*, Rev. 1, U.S. Department of Energy, Office of River Protection.

MD 1.8, "Employee Concern Resolution"

MD 2.1, "Information Management"

MD 5.3, "Corrective Action Program"

MD 5.4, "Event Response, Follow-up, and Report Evaluation"

RL/REG-98-05, *Inspection Description*, Rev. 4, U.S. Department of Energy, Office of River Protection

7.0 LIST OF ACRONYMS

OSR	Office of Safety Regulation
OL	On-Location
RPP-WTP	River Protection Project Waste Treatment Plant
VCO	Verification and Confirmation Official

Attachments: None

This page intentionally left blank.